

EXHIBIT C

Confidential - Per 2004 MDL 1358 Order

Page 307

VOLUME II
IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:
Methyl Tertiary Butyl:MDL NO. 1358 (SAS)
Ether ("MTBE") :
Products Liability :
Litigation :

CONFIDENTIAL (Per 2004 MDL 1358 Order)
In Re: City of New York

April 23, 2009

Continued CONFIDENTIAL
Videotaped Deposition of WILLIAM A.T.
MEAKIN, P.E., held in the law offices of
McDermott, Will & Emery, 340 Madison
Avenue, New York, New York, beginning at
approximately 9:44 a.m., before Ann V.
Kaufmann, a Registered Professional
Reporter, Certified Realtime Reporter,
Approved Reporter of the U.S. District
Court, and a Notary Public.

GOLKOW TECHNOLOGIES, INC.
877.370.3377 ph|917.591.5672 fax
deps@golkow.com

1 was reviewing it.

2 I would say '11. '09 is,
3 yes, '11.

4 Q. Fair enough. Okay. With
5 regard to the 55 mgd project, we will
6 have the facility plan in place, 10%
7 design completed sometime in 2011;
8 correct?

9 A. That's what I recall.

10 Q. With regard to the schedule
11 thereafter, it will take approximately
12 nine to ten years to bring the 55
13 million gallons on line, complete
14 construction and deliver water to
15 customers?

16 A. On this baseball card, yes.

17 Q. And with respect to your
18 testimony as the representative of the
19 City, is it your testimony that the
20 delivery of water from the 55 mgd
21 project will occur sometime between 2020
22 and 2021?

23 MR. REO: Objection. You
24 mean the full 55?

1 MR. STACK: The full 55.

2 And I'll clarify.

3 BY MR. STACK:

4 Q. With regard to completion
5 of the project and delivery of all 55
6 million gallons of water to be produced,
7 that will be achieved sometime in the
8 year 2020 or 2021 based on the current
9 schedule?

10 A. My goal in my past job was
11 to ensure that we adhered to the
12 schedule and get it done then or before
13 that, to beat that schedule. So if the
14 question is the schedule time, yes, my
15 job was to make sure that would happen
16 in that scheduled time or better.

17 Q. With regard to the schedule
18 that's set forth here in Exhibit No. 21,
19 and I'm really trying to figure out --

20 This is a very simple
21 question. You are testifying as a
22 representative of the City. I simply am
23 trying to establish in your capacity as
24 the person most knowledgeable for the

1 Dependability Program, is it your
2 testimony that this project is going to
3 be completed and on line by 2020 or
4 2021?

5 MR. REO: Objection, asked
6 and answered.

7 A. The job of the chief of
8 that division's job is to adhere to the
9 schedule and do better than the
10 schedule.

11 Q. And with regard to the
12 schedule -- I'm sorry, because I really
13 don't think that was responsive to my
14 question. I apologize.

15 A. I then misunderstood your
16 question, sorry.

17 Q. With respect to the
18 testimony that you are giving here as
19 the representative of the City of New
20 York, what is the date certain by which
21 all 55 million gallons that will be
22 produced in the first phase of the
23 Groundwater Dependability
24 Program/Project in Queens, what is the

1 date that that will be in service and
2 available to customers?

3 MR. REO: Objection. Asked
4 and answered.

5 A. The precise date. I can
6 give you a general date of -- the
7 schedule shows, after facility plan,
8 implementation is ten years. If the
9 facility plan is going to be finished by
10 11, so if I add ten years onto that, the
11 outside schedule says 1021 --

12 Q. With respect to --

13 A. -- 2021.

14 Q. With respect to the funding
15 decision to proceed and complete final
16 design and construct these facilities,
17 that decision will be made sometime
18 after 2011?

19 MR. REO: Objection.

20 A. Sorry. You'll have to --

21 MR. REO: Asked and
22 answered.

23 A. -- repeat that.

24 Q. Yes, sir. With respect to